



FILED ELECTRONICALLY VIA ECFS

February 29, 2008

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: EB Docket 06-36, CPNI Certification for 2008

Dear Ms. Dortch:

Enclosed for filing is Citizens Communications Company's Annual 64.2009(e) CPNI Certification, dated February 29, 2008, as ordered in EB Docket 06-36.

If you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Kevin Saville". The signature is written in a cursive, flowing style.

Kevin Saville
Associate General Counsel
2378 Wilshire Blvd.
Mound, Minnesota 55364
Telephone: 952-491-5564
Facsimile: 952-491-5577
Kevin.Saville@frontiercorp.com

Enclosure

cc: Enforcement Bureau, Telecommunications Consumers Division, Federal Communications Commission, 445 12th Street, SW, Washington, DC 20554
(two copies)

Best Copy and Printing, Inc., 445 12th Street, SW, Room CY-B402,
Washington, DC 20554, via e-mail to: fcc@bcpiweb.com

**CITIZENS COMMUNICATIONS COMPANY
ANNUAL SECTION 64.2009(e) CERTIFICATION
EB Docket No. 06-36**

Company Name: Citizens Communications Company and Subsidiaries

Form 499 Filer IDs: See Attachment B

Name of Signatory: Peter B. Hayes

Title of Signatory: Executive Vice President Sales, Marketing and Business
Development

Date Filed: February 29, 2008

I, Peter B. Hayes, hereby certify that I am a duly authorized officer of Citizens Communications Company and its subsidiaries which are telecommunications carriers (collectively the "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission, codified at 47 C.F.R. §§ 64.2001-64.2011, implementing Section 222(c) of the Communications Act of 1934, as amended.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that Citizens Communications Company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules. Except for one customer complaint summarized in the accompanying Attachment A in which the Company investigated the complaint and concluded that an unauthorized release of CPNI did not occur, the Company did not receive any customer complaints in 2007 concerning the unauthorized release of CPNI. The Company did not take any actions against data brokers in 2007.



Peter B. Hayes
Executive Vice President Sales, Marketing and Business Development
Citizens Communications Company

ANNUAL SECTION 64.2009(E)
CPNI CERTIFICATION STATEMENT
COVERING CALENDAR YEAR 2007
EB DOCKET NO. 06-36

In accordance with 47 C.F.R. § 64.2009(e), the following statement accompanies the officer compliance certificate and explains how the operating procedures of Citizens Communications Company and its subsidiaries, which are telecommunications carriers, ensure that the Company is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. §§ 64.2001-64.2011. The Citizens Communications Company subsidiaries that are telecommunications carriers generally do business under the name "Frontier Communications" and are identified, by name and by Form 499 Filer ID, in attachment B hereto.

- Only authorized Frontier Communications employees can access CPNI. Company personnel so authorized, such as customer service representatives and billing and collection personnel, are trained regarding the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.
- Frontier Communications' managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness.
- Frontier Communications has implemented reasonable processes and procedures to discover and protect against attempts to gain unauthorized access to CPNI. Frontier Communications authenticates a customer's identity prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or a retail center visit.
- Frontier Communications has implemented supervisory review processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI is required under the Commission's CPNI rules.
- Frontier Communications employees involved in marketing are trained as to what information and when CPNI may be used to market services to customers and what information and when CPNI may not be used under the Commission's CPNI

rules to market services to customers. All marketing campaigns that utilize CPNI are subject to supervisory approval and, where required, to verification of customer approval before CPNI is utilized. Records related to marketing campaigns that utilize CPNI are maintained for at least one year.

- Frontier Communications has implemented processes and procedures to prohibit the disclosure of CPNI to joint venture partners or independent contractors for the purpose of marketing communications-related services.
- Frontier Communications has implemented procedures to notify customers of their right to restrict access to, use of, and disclosure of their CPNI.
- Frontier Communications provides local and/or interexchange services to its customers. Frontier Communications uses CPNI without customer approval (i) to provide services to which that customer already subscribes, including the services and products enumerated in the FCC's rules as within its customers' total services, and (ii) those purposes enumerated in Section 222(d) of the Communications Act. Except where use of CPNI is otherwise permitted without prior customer approval, Frontier Communications only uses CPNI to market additional communications-related services upon either obtaining customer opt-out approval, consistent with Section 64.2007 of the Commission's rules or obtaining "one-time" customer consent for inbound or outbound telephone calls for the duration of the call, consistent with Section 64.2008(f) of the Commission's rules. Frontier Communications does not presently use or disclose CPNI in a manner that requires "opt-in" approval.
- Frontier Communications does not allow access or disclose CPNI online unless the customer provides Frontier Communications with a pre-established password.
- Frontier Communications has implemented processes and procedures to prevent the unauthorized release of customer call detail information it maintains. Frontier Communications will not release call detail information during a customer initiated telephone call unless (1) the customer provides Frontier Communications with a pre-established password, (2) Frontier Communications, at the customer's request, sends the call detail information to the customer's established address of record or (3) Frontier Communications calls the telephone number of record to disclose the call detail information. However, if the during a customer-initiated telephone contact, the customer is able to provide without assistance from Frontier Communications personnel all of the call detail information necessary to address a customer service issue, then Frontier Communications personnel are permitted to proceed with its routine customer care procedures in relation to such information. In addition, Frontier Communications may release call detail information to a customer during a retail center visit if the customer provides the pre-established password or provides a valid photo identification.

- Frontier Communications has implemented processes and procedures to notify customers immediately when a password or back-up means of authentication for lost or forgotten passwords, on-line account, or address of record is created or changed.
- Frontier Communications has implemented processes and procedures to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI in accordance with Commission rules.

ATTACHMENT A

Frontier Communications received one complaint in which the customer alleged disclosure to an individual not authorized to receive the information. Frontier Communications' Security and Legal Departments investigated the complaint and concluded that no unauthorized release of customer information had occurred. No other complaints were received.

**ATTACHMENT B - CITIZENS COMMUNICATIONS COMPANY
TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

FILER ID #	COMPANY
805302	Frontier Communications of Minnesota, Inc.
805782	Frontier Communications of Michigan, Inc.
805797	Frontier Communications of Illinois, Inc.
805851	Frontier Communications of Wisconsin LLC
805299	Frontier Communications of Iowa, Inc.
805857	Frontier Telephone of Rochester, Inc.
803939	Frontier Communications of America, Inc.
821046	Frontier Communications of Rochester, Inc.
805359	Frontier Communications of Alabama, LLC
805371	Frontier Communications of Fairmont LLC
805374	Frontier Communications of Mississippi LLC
805365	Frontier Communications of Georgia LLC
805368	Frontier Communications of Lamar County, LLC
805791	Frontier Communications of Pennsylvania, LLC
805776	Frontier Communications of Breezewood, LLC
805779	Frontier Communications of Canton, LLC
805806	Frontier Communications of Lakewood, LLC
805845	Frontier Communications of Sylvan Lake, Inc.
805830	Frontier Communications of Oswayo River, LLC
805773	Frontier Communications of AuSable Valley, Inc.
805839	Frontier Communications of Seneca-Gorham, Inc.
805794	Frontier Communications of New York, Inc.
805803	Frontier Communications of Lakeside, Inc.
805785	Frontier Communications of Indiana LLC
805788	Frontier Communications of DePue, Inc.
805842	Frontier Communications - St Croix LLC
805809	Frontier Communications - Midland, Inc.
805818	Frontier Communications of Mondovi LLC
805836	Frontier Communications – Schuyler, Inc.
805833	Frontier Communications – Prairie, Inc.

**ATTACHMENT B - CITIZENS COMMUNICATIONS COMPANY
TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

FILER ID #	COMPANY
805827	Frontier Communications of Orion, Inc.
805821	Frontier Communications Mt Pulaski, Inc.
805854	Frontier Communications of Viroqua LLC
805848	Frontier Communications of Thorntown LLC
805362	Frontier Communications of the South, LLC
803993	Citizens Telecommunications Company of New York, Inc.
803996	Citizens Telecommunications Company of the White Mountains, Inc.
803995	Citizens Telecommunications Company of Montana
803931	Citizens Telecommunications Company of Tennessee L.L.C.
820800	Citizens Telecommunications Company Minnesota, LLC
805113	Citizens Telecommunications Company Nevada
802899	Citizens Utilities Rural Company, Inc.
805119	Citizens Telecommunications Company of the Golden State
820716	Citizens Telecommunications Company of Illinois
802893	Citizens Telecommunications Company California Inc.
802920	Ogden Telephone Company
803988	Citizens Telecommunications Company of Utah
805038	Citizens Telecommunications Company of West Virginia
803994	Citizens Telecommunications Company of Idaho
805137	Citizens Telecommunications Company Oregon
805131	Navajo Communications Company, Inc.
805107	Citizens Telecommunications Company of Tuolumne
805146	Citizens Telecommunications Company of the Volunteer State LLC
820718	Citizens Telecommunications Company of Nebraska
801954	Rhineland Telephone LLC
822888	CTE Telecom, LLC
805650	Commonwealth Telephone Co.
815558	CTSI, LLC
801390	Global Valley Networks, Inc.
826150	GVN Services